

June 26, 2007

Ex Parte – Via Electronic Filing

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street SW
Washington, D.C. 20554

Re: In the matter of July 2007 Annual Access Charge Tariff Filings, National Exchange Carrier Association, Inc, Tariff F.C.C. No. 5, Transmittal No. 1172, Petition of GCI to Reject or, in the Alternative, to Suspend and Investigate Tariff Filing

Dear Ms. Dortch:

On June 25, 2007, I spoke with Don Stockdale, Associate Chief, Wireline Competition Bureau and on June 26, 2007 I spoke with Deena Shetler, Deputy Division Chief, Wireline Competition Bureau about the above captioned proceeding. My presentation reprised the points set forth in GCI's petition.

In addition, in my conversation with Ms. Shetler, I also pointed out that NECA contradicts itself when it describes the basis for assignment of companies to the DS-I rate bands. On the one hand, it describes these bands as based on "projected unit costs", but then on the next page states that companies are assigned to the band based on the "retention ratio." NECA Transmittal No. 1172, vol. 5 at 29-30. It appears that NECA has used bands to provide lower prices where competition exists and higher prices where no competition exists, irrespective of costs, rather than basing the bands on underlying cost.

A copy of this letter is being filed in the record of the above-captioned proceeding. Please let me know if you have any questions or concerns.

Sincerely,


John T. Nakahata
Counsel for General Communication Inc.

cc: Jeffrey Dupree, Director, Access Tariffs & Planning, NECA